

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Donald Wayne Andrews, Jr.

Case No.: 14-36384-KRH

Chapter: 7

2015 MAR 13 PM 2:02
U.S. BANKRUPTCY COURT
RICHMOND DIVISION

FILED

MOTION FOR CLARIFICATION

COMES NOW Petitioner, and moves this Honorable Court for clarification. In support of this motion Petitioner states as follows:

1. This morning, March 13, 2015 at 07:00 federal agents came to Petitioner's home with guns and badges and questioned Petitioner about posting the Meeting of Creditors on YouTube. The agents identified themselves as the U.S. Marshall Service and the Federal Bureau of Investigation. The federal agents attempted to gain access to Petitioner's home and refused to conduct the interrogation in the presence of a lawyer.
2. The federal agents refused to provide their questions in writing and refused to provide Petitioner a card with their names and identifying information.
3. The federal agents told Petitioner that they knew he had an upcoming trial in April, and if he wanted "a fair shake" at his trial, he must allow them to interrogate him in absence of counsel.
4. The federal agents threatened Petitioner with contacting his employer, and contacting his employer's HR department. The federal agents told Petitioner, "We would hate to have you miss work because of this", and "We really don't want to have to do this through your employer". The federal agents then identified Petitioner's employer saying, "We know where you work".
5. The federal agents asked "Why do you think Shannon Pecoraro's daddy paid for her college?"
6. The federal agents became very frustrated when Petitioner refused to grant them access to his home, and said "I guess we are going to have to do this at your work".

WHEREFORE, Petitioner respectfully prays this Honorable Court will clarify the following:

1. Why federal agents with guns and badges came to Petitioner's home and attempted to bully Petitioner into removing his YouTube post, violating his right to free speech?
2. Is it this Honorable Court's policy to send federal agents with guns and badges to petitioners' homes when public information is posted online which is unfavorable to the Trustee's Office?
3. Which part of Petitioner's upcoming trial will not be fair because Petitioner refused to be interrogated in absence of counsel?
4. Why will Petitioner be "missing work" if he doesn't remove the YouTube posting?
5. When did this Honorable Court, or its trustees, contact a law enforcement agency regarding Petitioner's obvious public criticism of its policies and procedures, and what was the context and substance of that contact?

Date:

3/13/2015



Donald Wayne Andrews, Jr.
2408 Burgage Lane
S. Prince George, VA 23805
(757) 701-6904

CERTIFICATE OF SERVICE

I hereby certify that a copy of MOTION FOR CLARIFICATION was mailed via first class mail on March 13, 2015 to:

U.S. Department of Justice
Office of the United States Trustee
701 E. Broad Street
Suite 4303
Richmond, VA 23219



Donald W. Andrews Jr.
2408 Burgage Lane
S. Prince George, VA 23805
(757) 701-6904

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Donald Wayne Andrews, Jr.)
)
 [Set forth here all names including married, maiden, and)
 trade names used by debtor within last 8 years.])
)
 Debtor) Case No. 14-36384-KRH
) Chapter 7
 Address 2408 Burgage Lane, S. Prince George VA 23805)
)
)
 Last four digits of Social Security or Individual Tax-payer)
 Identification (ITIN) No(s).,(if any): 0072)
)
 Employer's Tax Identification (EIN) No(s).(if any):)
)

NOTICE OF MOTION (OR OBJECTION)

Donald Wayne Andrews, Jr. has filed papers with the court to Motion for Clarification

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before _____, you or your attorney must:

File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
Eastern District of Virginia

You must also mail a copy to:

- Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**
- Attend the hearing on the motion (or objection) scheduled to be held on April 1, 2015 at 1:00 p.m. at United States Bankruptcy Court, Eastern District of Virginia

701 E. Broad St., Courtroom 5000, Richmond, VA
23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 3/13/2015

Signature, name, address and telephone number of person giving notice:

Donald W. Andrews, Jr.
2408 Burgess Lane
Prince George, VA 23805

Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this 13 day of March, 2015, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

Chris